

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SEA MAR COMMUNITY HEALTH  
CENTERS,

Plaintiff,

v.

ACCREDITATION COUNCIL FOR  
GRADUATE MEDICAL EDUCATION,

Defendant.

Case No. C24-896 JNW

**JOINT NOTICE OF AGREEMENT  
TO AMEND PLEADING**

Pursuant to Federal Rule of Civil Procedure 15(a)(2) and Local Rules W.D. Wash. LCR 15(b), Plaintiff Sea Mar Community Health Centers (“Sea Mar”) and Defendant Accreditation Council for Graduate Medical Education consent to the filing of Sea Mar’s Second Amended Complaint (the “SAC”).

In accordance with LCR 15(b), Sea Mar attaches as Exhibit A a redlined version of the SAC showing how it differs from Sea Mar’s First Amended Complaint. *See* Dkt. No. 43. The SAC in final format (i.e., without redlining) will be filed and served concurrently with this joint notice.\*

\* Under the terms of the Stipulated Protective Order entered by the parties and approved by the Court, the SAC is subject to the process outlined in LCR 5(g). *See* Dkt. No. 38 at 4. The unredacted SAC will therefore be filed under seal, with a redacted version filed on the public docket. In the interest of efficiency, the redlined version of the SAC attached to this joint notice reflects the redaction applied to the publicly filed SAC. If the Court prefers, Sea Mar will also file an unredacted redline under seal.

JOINT NOTICE OF AGREEMENT TO  
AMEND PLEADING – 1  
(No. C24-896 JNW)

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1 Dated: January 9, 2025

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**CERTIFICATE OF SERVICE**

I certify under penalty of perjury that, on January 9, 2025, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notification of the filing to the email addresses indicated on the Court's Electronic Mail Notice List.

Dated: January 9, 2025

s/ David B. Robbins

David B. Robbins